

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION**

DEBRA BEYAH,

Plaintiff,

v.

WAL-MART STORES EAST, L.P.,

Defendant.

CIVIL ACTION NO. 1:06-CV-659 CSC

JURY DEMANDED

JOINT MOTION FOR ENLARGEMENT OF DISPOSITIVE MOTION DEADLINE

Plaintiff, Debra Beyah (“Plaintiff”), and Defendant Wal-Mart Stores East, L.P. (“Defendant”), jointly and respectfully move the Court for a 14-day extension of time, through and including July 30, 2007, to file dispositive motions. In support of this motion, the parties respectfully show the Court as follows:

1.

Pursuant to Court Order, the dispositive motion deadline is July 16, 2007 and the discovery deadline is September 28, 2007. (Doc. 26.)

2.

After extensive written discovery and conducting several depositions, Plaintiff and Defendant voluntarily agreed that mediation would be productive. Therefore, on July 6, 2007, the parties engaged in a full day of mediation. Although the parties were unable to reach resolution, they were able to make significant progress, and they agreed to continue to actively participate in the mediation process.

3.

The parties request that this Court extend the dispositive motion deadline by fourteen (14) days, through and including July 30, 2007, so that the parties may continue their settlement negotiations, without incurring additional legal fees and expenses, which may hinder settlement negotiations. The parties are not requesting an extension of the September 28, 2007 discovery deadline, or the present trial date set for October 1, 2007.

4.

The parties do not anticipate that any further extensions will be necessary.

5.

Counsel for Plaintiff has reviewed this Motion and has given Defendant permission to submit her electronic signature hereon.

WHEREFORE, the parties jointly and respectfully request that the Court grant a 14-day extension of time, through and including July 30, 2007, for the parties to file dispositive motions in the above-referenced case.

This 9th day of July 2007.

s/ Charlotte K. McClusky, Esq.

Charlotte K. McClusky

ASB-5296A57M

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ATTORNEYS FOR PLAINTIFF

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CERTIFICATE OF SERVICE

I hereby certify that on July 9, 2007, I electronically filed the foregoing ***Joint Motion For Enlargement Of Dispositive Motion Deadline*** with the Clerk of the Court using the CM/ECF system which will provide notice to the following: Ann C. Robertson, Temple D. Trueblood, and Bobbie S. Crook.

s/ Charlotte K. McClusky, Esq.
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